

**Violet Elizabeth Grayson Time Billed in Zuegel v. MVPD et al.;**  
**Case No. 17-cv-03249**

<b>TOTAL HOURS DOCUMENTED</b>	<b>1410.7</b>
<b>Legal Services Rendered</b>	<b>Hours</b>
6/26/17 - Review client documents in preparation for meeting w/Zuegels	3.0
6/27/17 - Conversation with Jim and Lisa re case	2.3
6/28/17 - Further conversation with Zuegels re case	3.2
7/10/17 - Library research for Federal Civil Rights Complaint	2.3
7/10/17 - Create and file Notice of Appearance for Federal Case	0.5
7/20/17 - Read material downloaded from drop box	2.0
7/2/17- Read material downloaded from drop box	1.9
8/31/17 - Begin drafting federal complaint (2.0); search for officers' first names (.5); correspondence with Jim re same (0.5)	3.0
9/9/17 - More research for federal complaint (3.0); drafting of federal complaint (2.9)	5.9
9/10/17 - Edit federal complaint	2.0
9/11/17 - Further revisions and proofing of federal complaint (1.2) transmit to client (.2)	1.4
9/12/17 - Exchange e-mail with Jim re revealing cases to probation officer (.3); review Jim and Lisa's comments on federal complaint; telecom with Jim and Lisa (.5);input changes to federal complaint (1.0)	1.8
9/13/17 - Final proofing of federal complaint (1.0); file withcourt (0.5); create complete package for service of process (0.5); discussions w/Jim re arrangements for service (0.3)	2.3

9/14/17 - E-mail correspondence with Jim re service (0.1); read Judge Freeman's standing orders (0.3)	0.4
9/15/17 - correspondence with Judge Freeman's courtroom deputy re available dates for motion to change case caption and redact names from original complaint; also re Case Management Conference date	0.5
9/18/17 - Correspondence w/process server and Jim re service of MVPD Officers	0.2
9/19/17 - Further communications w/process server and MVPD supervisor re service of process	0.2
9/20/17 - telecoms w/newly appearing MVPD counsel and client re stipulation to service of process and related matters; e-mail correspondence w/process server	0.7
9/21/17 - Negotiate and complete stipulation w/ adverse counsel re service of process and scheduling in federal case adv. MVPD	1.0
9/22/17 - Research use of pseudonym in federal court (1.5) e-mail exchange w/adverse counsel re same (0.3) ; telecom w/Jim (0.2)	2.0
9/23/17 - Draft motion to proceed under pseudonym in federal court	3.0
9/24/17 - Send motion to proceed under pseudonym to client for comment; correspondence re same	0.4
9/25 - Revise and proofread motion to proceed under pseudonym	0.5
9/26/17 - File motion to proceed under pseudonym - prepare and transmit chambers copy	0.5
9/27/17 - E-mail exchange w/Jim re motion to proceed under pseudonym etc.	0.1
10/11/17 - Draft Reply Declaration and Memorandum of Law re Motion for Anonymity (2.2); communications with Jim and Lisa (.7)	2.9

10/12/17 Revise and file reply docs. on motion for anonymity	1.2
10/18/17 - receive and review order denying leave to proceed under pseudonym (0.5); correspondence same (0.2)	0.7
10/19/17 - Further communications re order denying leave to proceed under pseudonym (1.0); telephone prospective expert witnesses (1.0)	2.0
10/23/17 - Telecom w/Brian Madden (1.0); redact and file original complaint (3.0); e-mail Jim (.1)	4.1
10/28/17 - Download and initial review of MVPD Motion to Dismiss	1.0
10/30/17 - Transmit MVPD Motion to client; e-mail and telecom w/Jim	0.6
10/31/17 - e-mail exchange w/Jim re scheduling, punch-list etc.	0.3
11/30/17 - Begin work on Opp. Rule 12 motion to dismiss MVPD case	2.4
12/3/17 - Further work on Opp. Rule 12 motion to dismiss MVPD case 3.1	
12/4/17 - Further work on Opp. Rule 12 motion to dismiss MVPD case	3.2
12/5/17 - Further work on Opp. Rule 12 motion to dismiss MVPD case	4.1
12/6/17 - Further work on Opp. Rule 12 motion to dismiss MVPD case	4.7
12/7/17 - Further work on Opp. Rule 12 Motion to Dismiss MVPD case	4.9
12/8/17 - Complete, finalize, and file Opp. Rule 12 Motion to Dismiss MVPD Case	4.5

12/12/17 - transmit file-stamped version of Opp. Rule 12 motion to dismiss to clients	0.1
12/20/17 - Read MVPD Reply (0.5) discuss w/Jim (0.2)	0.7
12/21/17 - Letter to Judge Freeman re MVPD request that court consider evidence on Rule 12 Motion	0.7
1/3/18 - Rule 26 conference w/adverse counsel in MVPD case (1.0); prepare joint report of meeting and file with Court (2.0); copy to client (0.1)	3.1
1/17/18 - Prepare further MVPD federal case management statement in conjunction with adverse counsel	1.2
1/18/18 - E-mail MVPD case management statement to Jim, and e-mail exchange re same	0.2
2/7/18 - Preparation for oral argument of MVPD motion to dismiss SAC	2.2
2/8/18 - Oral argument of MVPD motion to dismiss SAC	2.0
2/10/18 - Review e-mail from Jim	0.1
4/20/18 - Receive and review Judge Freeman's order on MVPD motion to dismiss (1.0); to clients (0.1)	1.1
4/21/18 - Review and respond to Jim's comments and questions regarding Judge Freeman's order	.9
5/15/18 - Read Maurice email notes from night of arrest & telecom w/Maurice (1.1) , work on locating bail bondsman to serve as expert witness (.7)	1.8
5/16/18 - Select and interview bail bondman expert	0.8
5/17/18 - Reread Judge Freeman's opinion on motion to dismiss - begin legal research pertinent to Second Amended Complaint	3.9
5/26/18 - Begin work on Second Amended Complaint	2.5

5/27/18 - More work on Second Amended Complaint adv. MVPD.	3.1
5/28/18 - Additional work on Second Amended Complaint adv. MVPD.	3.3
5/29/18 - Complete draft of Second Amended Complaint adv. MVPD.	2.5
5/30/18 - Review Lisa's suggestions for Second Amended Complaint and begin revisions	1.2
5/31/18 - Complete and file Second Amended Complaint v. MVPD.	1.3
6/21/18 - Correspondence re hearing date for next motion in federal court .	.2
6/22/18 - Arrangements with federal court for hearing date on MVPD motion to dismiss Second Amended Complaint.	0.2
6/24/18 - Telephone conversation with Jim re status.	0.5
7/2/18 - Correspondence with Defendants' counsel re briefing schedule on Motion to Dismiss Second Amended Complaint adv. MVPD (0.2); draft and file stipulation (0.5)	0.7
8/3/18 - Review Defendants' renewed Rule 12(b)(6) Motion to Dismiss - Rewatch arrest tape - legal research	5.2
8/4/18 - Begin drafting opposition to renewed Rule 12(b)(6) motion	4.5
8/5/18 - Further drafting of opposition to renewed Rule 12(b)(6) motion	4.2
8/6/18 - Complete draft of opposition to renewed Rule 12(b)(6) motion	6.7
8/7/18 - Revise Opposition to Rule 12(b)(6) motion per client suggestions	2.1
9/23/18 – Download and read Defendants' Reply Brief	

in Support of Motion to Dismiss SAC; shephardize cases	1.3
9/25/18 – Begin review of cases in preparation for oral argument on Defendants’ Motion to Dismiss Second Amended Complaint	1.5
9/26/18 - Further preparation for 9/27 oral argument on 12(b)(6) motion (read all motions papers and cases, Shepardize cases.)	6.0
9/27/18 - Complete preparation for oral argument and orally argue in opposition to motion to dismiss SAC	3.4
10/2/18 - Communications with Jim re effort to obtain booking records from Santa Clara County	0.7
10/10/18 – Research and write letter brief to Judge Freeman regarding money damages for unconstitutional interrogation where suspect did not confess	4.0
10/11/18 - Complete and file supplemental brief re damages for interrogation without counsel where suspect does not confess	1.9
10/15/18 - Read Jim’s correspondence re public records request	0.2
10/26/18 Receive, read and forward Judge Freemans’s order on Motion to Dismiss SAC	1.0
10/29/18 - Read and forward Judge Freeman’s ruling on issue of damages for interrogation without counsel absent a confession	0.6
11/6/18 - Research supplemental brief re Article III standing to seek injunctive relief under Bane Act	.3
11/7/18 - Telecom w/Jim (.5); draft supplemental brief re Article III standing for injunctive relief (3.2)	3.7
11/8/18 - Transmit draft supplemental brief re Article III standing to Jim; review and incorporate Jim’s comments	1.9
11/9/18 - Complete and file supplemental brief re Article III standing for injunctive relief; read Defendant’s Brief on same subject	2.1
11/21/18 - Read Judge Freeman’s opinion re Article III standing for injunctive relief and transmit to Jim	0.6

12/10/18 - Draft first request for production of documents	1.9
12/11/18 - Proof request for production of documents (.4) transmit to Jim (.1) ; follow up on scheduling with MVPD counsel (.5)	1.0
12/12/18 - Create deposition notices and transmit to MVPD counsel	1.5
12/13/18 - Correspond w/Jim re videotaping of depositions and related matters	0.5
12/23/18 - E-mail to MVPD counsel re scheduling	0.2
1/4/19 - E-mail to Jim re calculation of damages for initial disclosure in federal case	0.3
1/7/19 - Read e-mail from MVPD counsel re protective order and scheduling; respond	0.3
1/11/19 - Further correspondence w/MVPD counsel re protective order	0.2
1/12/19 - Begin work on witness list for initial disclosure	1.0
1/14/19 - Communicate w/Jim re protective order etc.	0.2
1/15/19 - Communicate w/Jim and adverse counsel re protective order and scheduling etc.	0.5
1/18/19 - E-mail exchange w/Jon H. re deposition dates and protective order	0.2
1/21/19 - Review Defendants' initial response to request for production; review first tranche of documents received from defendants	3.5
1/22/19 - Edit Defendant's Draft Protective Order (.9) correspondence w/Jon H. re protective order (1.0); review Defendants' supplemental response to request for production of documents and declaration re disciplinary personnel records withheld (2.0)	3.9
1/30/19 - telecoms w/Jon H. re documents withheld and temporary protective order (0.5); review, acknowledgment and transmit to Jim for signature (0.5); further review of documents produced by defendants (1.0)	2.0

1/31/19 - telecom w/Jim re protective order (0.4); transmit executed acknowledgement to Jim(0.5)	0.9
2/3/19 - Commence deposition preparation by reviewing documents and videos (2.0); begin depo. outline (0.5)	2.5
2/4/19 - Obtain and review police handbooks (3.0); correspondence w/Jon and Jim concerning persons to attend depositions (0.5); further correspondence re dates of future depositions (0.2); further work on deposition outline (1.3)	5.0
2/5/19 - Review Jim's edit of deposition outline then discuss with Jim and finalize outline (4.0); select and organize documents for use at depositions (4.2)	8.2
2/6/19 - Deposition of Officer Patrick Ward	6.5
2/7/19 - Deposition of Officer Britton Moore	6.0
2/10/19 - Correspondence w/Jon H. re Initial Disclosures	0.2
2/27/19 - Correspondence re MV city council agenda	0.2
2/28/19 - Correspondence re inquiry from journalist Mark Noack re upcoming MVPD meeting	0.3
3/2-4/19 Short e-mails to set up telephone call with JZ	0.1
3/5/19 - Telecom w/JZ (update)	0.4
3/12/19 - Correspondence and telecoms w/JZ and adverse counsel re scheduling	0.5
3/20/19 - Further telecoms and texts re moving April depositions to June	0.2
3/25/19 - correspondence w/adverse counsel re Initial Disclosures and depositions	0.2
3/27/19 - Further correspondence w/adverse counsel re Initial Disclosures and Depositions	0.1
4/8/19 - Further correspondence w/adverse counsel	



re Initial Disclosures	0.1
4/23/19 - correspondence w/JZ re court reporter invoice	0.1
4/29/19 - e-mail JZ re computation of damages	0.1
5/6/19 - Review Jim's computation of damages and respond	0.6
5/8/19 - Review Jim's revised computation of damages; correspondence re same; correspondence re court reporter invoice	1.2
5/9/19 - Further correspondence re computation of damages	0.5
5/12/19 - Read Ward Deposition (take notes)	3.4
5/13/19 - Finish reading Ward Deposition and begin reading Moore Deposition (take notes)	3.2
5/14/19 - Finish reading Moore Deposition (take notes)	2.8
5/16/19 - E-mail adverse counsel to confirm deposition dates in May	0.1
5/17/19 - Further correspondence w/adverse counsel re deposition dates and Initial Disclosures (0.2); review Defendants' Initial Disclosures (0.6)	0.8
5/19/19 - Further e-mails and telecom w/JZ re his deposition (0.5), review file, documents and videos in anticipation of JZ Deposition (4.0)	4.5
5/20/19 - e-mail exchange w/JZ re witness lists and transmit Defendants' witness list to JZ (.3); prepare JZ for deposition (3.1)	3.4
5/21/19 - Defend JZ Deposition (includes r/t travel SF/SJ)	9.0
6/4/19 - Correspondence with client and adverse counsel re July deposition dates	0.2
6/10/19 - further correspondence re July depo dates	0.2

6/14/19 - read news article re sexual assault exam of 5 year old by MVPD	0.2
6/20/19 - transmit JZ depo TR to client (0.1); begin reading and taking notes (2.7)	2.8
6/21/19 - cont. reading JZ depo TR (2.7); correspondence w/JH and JZ re obtaining disc of video of JZ depo (0.2)	2.9
6/22/19 - cont. reading JZ depo TR (1.0); further correspondence re obtaining video of JZ depo (0.2)	1.2
6/23/19 - Finish reading JZ depo. TR	0.8
7/16/19 - Confirm deposition dates, times, and location w/JH; transmit deposition notices	0.2
7/18/19 - Email JH reminding him to send dispatch logs	0.1
7/19/19 - Further correspondence w/JH re dispatch logs	0.1
7/20/19 - Transmit interrogation TR to JZ (.1); select documents to use as exhibits at next week's depositions (3.0); review Second Amended Complaint and prior opinions of the court in preparation for depositions (1.1)	4.2
7/21/19 - review TR of JZ depo (5); review notes on JZ, Moore, and Ward depositions. (0.8); watch video of JZ depo (0.5); begin preparation of outline for Garcia depo (0.5)	6.8
7/22/19 - review CAD printouts and additional MVPD policy statements forwarded by JH (1.0); complete Garcia depo outline (3.7); draft Ward and Moore supp. depo outlines (2.5)	7.2
7/23/19 - Revise Garcia depo outline and incorporate Jim's ideas from e-mail (2.1); depose Det. Garcia (4.9); revise depo outlines for Moore and Ward (1.9)	8.9
7/24/19 - Complete depositions of Garcia, Moore, and Ward (5.1); meet w/Lisa Zuegel (2.0)	7.1

7/26/19 - E-mail JH re Lisa Zuegel depo date	0.2
8/16/19 - correspondence w/Jon H. re identity of PMK (person most knowledgeable) deponents and dates for PMK depositions (0.3); email exchange re date for LZ depo. (0.2)	0.5
8/24/19 - E-mail exchange w/Jon H. re upcoming depositions; e-mail exchange w/L.Z. re deposition and preparations	0.3
8/26/19 - confirm deposition locations and times	0.2
8/27/19 - Set telephone call with Jim for 8/29	0.1
9/11/19 - E-Mail and telecom exchange w/Jim re Lisa's depo. prep. (0.6); prepare notice of Marco Garcia PMK depo. (.7)	1.3
9/12/19 - Review Garcia deposition transcript in preparation for Garcia PMK depo. (3.8); Further e-mail exchange w/Jim re Lisa's deposition (.3)	4.1
9/13/19 - Prepare outline and documents for Garcia PMK depo. (3.5); begin review of portions of Jim's deposition pertinent to Lisa's deposition and make notes (1.8); e-mail Lisa re deposition prep. (0.2)	5.5
9/14/19 - Complete review of portions of Jim's depo. pertinent to Lisa's depo. (1.0); review portions of body-cam video pertinent to Lisa's depo. (0.5); create outline for Lisa's depo. preparation (2.1)	3.6
9/15/19 - E-mail exchange w/Lisa re depo prep.	0.2
9/16/19 - Depose Marco Garcia as PMK (inc. travel) (2.5); further exchange w/Lisa re depo prep. (0.5); email exchange w/Jon H. re dates for further PMK depositions (.4)	3.4
9/17/19 - Lisa deposition prep including travel between SF and Los Altos	7.0
9/18/19 - Prepare outline for "practice depo.," practice depo w/Lisa (inc. travel SF/Los Altos)	8.0

9/19/19 - LZ depo. (incl. travel SF/SJ)	9.2
9/21/19 - e-mail scheduling order to Jim	0.1
9/22/19 - Create deposition notices and subpoenas <i>duces tecum</i> for remaining PMK depositions. (1.9); email cases w/brief descriptions to Jim (.3)	2.2
10/25/19 - Further e-mail exchanges w/clients and adverse counsel re scheduling	0.3
10/26/19 - e-mail to Lisa re her deposition transcript	0.5
10/30/19 - begin review of Lisa Zuegel Deposition Transcript	3.0
10/31/19 - Complete review of Lisa Zuegel deposition transcript	2.6
11/4/19 - e-mail exchange with Lisa Zuegel re scheduling telecom to discuss possible corrections to deposition transcript	0.1
11/5/19 - Telecom w/Lisa concerning possible changes to her depo. transcript (.07); read Marco Garcia PMK depo. transcript (0.9)	1.6
11/6/19 - Further exchange with Jim re scheduling	0.6
11/8/19 - Begin research re municipal liability under section 1983 in preparation for Chris Hsiung depo.	3.3
11/11/19 - Multiple e-mail exchanges w/Jim and Jon re deposition schedule and production of documents in response to subpoena <i>duces tecum</i>	0.4
11/12/19 - Further e-mail exchanges and phone call re deposition dates and production of documents responsive to subpoena <i>duces tecum</i>	0.5

11/15/19 - Complete research re municipal liability (1.5) ; begin review of notes on individual defendants' deposition transcripts in preparation for Chris H. depo. (0.5) ; email exchange w/Jon re further deposition dates and document production (0.4)	2.4
11/16/19 - Further preparation for Chris H. depo.	2.3
11/17/19 - Complete prep. for Chris H. depo (3.2); email exchange w/Jon(0.4)	3.6
11/18/19 - First day of Chris H. depo. (inc. r/t travel between Pac. Heights and Fin. Dist.)	6.0
11/19/19 - Draft stipulation extending discovery cut off and send to Jon (0.6); supplemental prep. for Chris H. depo. (1.6)	2.2
11/24/19 - Read and respond to Jim's email re invoice and court reporter billing	0.2
11/25/19 - Further correspondence with Jim re court reporter's charges; correspondence w/ Jon re deposition dates	0.4
11/26/19 - Text Jim re Maldonado and Thompson depo dates	0.1
12/2/19 - Follow up text to Jim re depo dates (0.1); research re procedure on leave to amend (2.8)	2.9
12/5/19 - Text exchange w/Jim re confirmation of deposition dates	0.2
12/6/19 - Text exchange re change of deposition dates	0.2
12/9/19 - Further e-mail exchange w/Jim and Jon re scheduling (0.2); telecom w/Jon re case administration (0.5)	0.7
12/10/19 - Further e-mails with Jon re deposition schedule	0.5
12/11/19 - E-mails and telecom w/Jon re depo	

schedule and case administration	0.3
12/12/19 - Text exchange w/Jim re deposition schedule including deposition of Max Bosel (0.2); exchange re parties defendants intend to depose (0.9); arrangements with Esquire re court reporter, videographer and conference room (0.5)	1.6
12/13/19 - E-mail exchange re choice of future deponents (0.3); begin reading Hsiung Deposition and taking notes (3.1)	3.4
12/14/19 - Finish reading Hsiung Deposition TR and taking notes (4.5); begin preparation for Thompson Deposition (1.8)	6.3
12/15/19 - Transmit Hsiung Deposition TR to Jim (.2); complete preparation for Thompson Deposition (4.5)	4.7
12/16/19 - Prepare for Maldonado deposition (4.0); change deposition dates and times with Esquire (0.5); read Maldonado Declaration in Opposition to disclosure of personnel records and research (1.5) ; e-mail exchanges w/Jon re confidentiality (.8); e-mail Jon w/proposed dates for Bosel deposition (0.3)	7.1
12/17/19 - E-mail exchange w/Jon re form of protective order for police personnel records (0.8); depose Sean Thompson (inc. travel) (3.5); draft limited protective order and email to Jon (1.8)	6.1
12/18/19 - Depose Sergeant Maldonado inc. travel (3.1) finalize summary judgment briefing schedule (1.0); file proposed stipulated protective order (0.5); e-mail exchange w/asst. to Judge Brazil re availability for mediation (0.7); e-mail to Jon re failure to search electronically for missing emails, memoranda and texts (0.8) ; text exchange w/Jim re future depositions (0.2)	6.3
12/19/19 - File proposed summary judgment briefing schedule	0.4
12/20/19 - Receive signed protective order and save	0.1
12/21/19 - e-mail update to Jim (0.3); arrangements with Judge Smith (mentor) for time to discuss amended Complaint (0.2).; research re Jon's demand for Rule 35 Psychological examination (2.9)	3.4

12/23/19 - text exchange re meeting with Cecil Webb re damage computation	0.4
12/30/19 - Telecom w/Judge Smith re Zuegel case (amendment of complaint and possibility of adding Jeffrey as Plaintiff)	1.5
12/31/19 - Research re statute of limitation for adding Jeffrey as Plaintiff	2.0
1/2/20 - Meeting w/Cecil Webb (0.7); further arrangements for mediation (0.5)	1.2
1/3/20 - Further e-mail exchange re setting up Brazil Mediation	0.5
1/7/20 - Set up telephone conference w/Jim and Lisa (0.3) ; have conference discussing possibility of adding Jeffrey as plaintiff and related matters (1.1); further e-mail exchange re setting up Brazil mediation (0.4)	1.8
1/8/20 - Further e-mail exchange w/Jim, Jon and Aimee re Brazil mediation	1.2
1/9/20 - Further e-mail exchange re mediation with Judge Brazil	0.3
1/10/20 - Further e-mail exchange w/Jim re mediation (0.2); begin reading Thompson and Maldonado deposition transcripts and taking notes (1.7)	1.9
1/11/20 - Finish reading Maldonado and Thompson Depositions and taking notes	2.0
1/13/20 - e-mail exchange w/Aimee re mediation agreement; location etc.	0.2
1/14/20 - exchange w/Aimee (Brazil asst.) re payment for mediation	0.1
1/15/20 - Receive and transmit to Jim engagement letter and related materials from Judge Brazil (0.4); E-mail to Jim re remaining discovery to be completed (0.4); telecom w/Jim re above (0.4)	1.2
1/20/20 Review Jim's e-mail re "follow-up ideas";	

attempt to contact Jim to discuss same	0.8
1/21/20 - Telecom w/Jim re strategy	0.7
1/22/20 - Research whether there has been any change in the law regarding exclusion of Maurice from interrogation (1.0); work on Third Amended Complaint (3.8)	4.8
1/23/20 - Further work on Third Amended Complaint	3.8
1/24/20 - “Nudge” e-mail to Jim re deponents and dates (0.2); locate and read Lothar Complaint; read Jim’s e-mail re interviewing people who worked at YMCA on date of alleged touching (1.2)	1.4
1/25/20 - Further work on Third Amended Complaint	2.8
1/26/20 - Further work on Third Amended Complaint (4.0) ; e-mail to Jon re completing document production to include e-mails and memoranda (0.4); e-mail to Jon re remaining deponents and dates (0.3); check for match between dates when Garcia was responsible for Crimes against Children and <i>Lothar</i> incident (0.5); e-mail to Jim re same (0.2)	5.4
1/27/20 - exchange w/Jon and Jim re deposition dates and police discipline docs	0.5
1/28/20 - review defendant’s request for production of documents and e-mail exchange with Jim and Jon re same	0.6
1/29/20 - telephone conf. w/Jon re outstanding discovery issues including failure to search for electronically stored documents	0.5
1/30/20 - further correspondence re deposition dates and receipt of police disciplinary records	0.2
1/31/20 - e-mail Jon re who will be attending mediation (0.2); further work on 3d Amended	



Complaint (0.8); telecom w/Dr. Wasserman re his deposition (0.5)	1.5
2/1/20 - further correspondence w/Jon & Jim re deposition dates (0.2); correspondence w/Jon re Wasserman deposition prep. date and Wasserman document production (0.4)	0.6
2/2/20 - Further correspondence w/Jon & Jim re deposition dates	0.1
2/3/20 - Complete draft 3d Amended Complaint and send to Jim & Lisa (1.8); text Jim re getting release forms to Dr. Wasserman (0.2)	2.0
2/4/20 - correspondence w/Jim & Jon re depo dates (0.2); transmit draft Third Amended Complaint to Jim (0.2)	0.4
2/6/20 - Review Jon's email re Wasserman depo and psych evaluation (0.5); research federal case law re psych evaluation (1.5)	2.0
2/7/20 - e-mail Jon re acceptance of subpoena on behalf of Dr. Wasserman & conditions for stipulating to psych evaluation (1.8); whether Jon will stipulate to filing of 3d Amended Complaint (0.5)	2.3
2/8/20 - Google Dr. Davies (0.4); research cases cited by Jon for proposition that I may not attend psych evaluation (1.4)	1.8
2/9/20 - extended response re Jon's position that I may not attend psych evaluation (2.5) ; review Dr. Wasserman's chart notes received from Jim (1.0) ; review Jim and Lisa revisions to draft Third Amended Complaint (0.5); telecom w/Jim and Lisa (0.8)	4.8
2/10/20 - Revise Third Amended Complaint incorporating client comments (3.7) ; e-mail to Jim re psych evaluation issue and my attendance (0.5)	4.2
2/10/20 - Further correspondence w/Jon re psych evaluation (1.0); prep for Beninger depo (2.8)	3.8
2/11/20 - Further correspondence w/Jon re my appearance at psych exam (0.7); further preparation for	

Beninger deposition (2.0) ; further revisions to Third Amended Complaint and discussion with Jim re same (2.5)	5.2
2/12/20 - Further correspondence w/Jon and Jim re psych evaluation (1.0); Beninger deposition inc. r/t travel between SF and SJ (4.5); discussion w/Jim re document production (2.0); further revisions to Third Amended Complaint (0.9)	8.6
2/13/20 - e-mails re logistics for Bosel depo. (0.2); prepare for Bosel depo. (3.1); correspondence re completing production of police disciplinary records and completion of Maldonado depo (0.5); research <i>Lothar</i> settlement and transmit info to Jim (0.7)	4.5
2/14/20 - deposition of Max Bosel (3.5); psych evaluation (2.5); r/t travel SF/SJ (2.0)	8.0
2/15/20 - e-mail correspondence w/Jim re meeting in SF on Sunday 16	0.2
2/16/20 - Meeting w/Jim and Lisa in SF re settlement strategy	1.3
2/17/20 - Correspondence w/Jim re document production	0.5
2/18/20 - Correspondence w/Jon re completion Jim's audio recording of psych evaluation (0.3); begin work on mediation brief (2.4)	2.7
2/19/20 - Further work on mediation brief and transmit to Jim and Lisa (2.7); follow up on defendants' production of electronically stored documents (0.5)	3.2
2/20/20 - Complete mediation brief and transmit to Judge Brazil (2.7); begin prep for mediation (1.0); further work on Third Amended Complaint incorporating Jim's edits (1.0)	4.7
2/21/20 - Transmit completed Third Amended Complaint to Jon (0.2); e-mail exchange w/Jim re	

whether we should exchange mediation briefs and amount of damages to claim (0.5); exchanges w/ Jim and Jon re audio recording of psych evaluation (0.2)	0.9
2/23/20 - e-mail exchange and telecom w/Jim re upcoming mediation	0.6
2/24/20 -Exchange mediation briefs w/Jon and read his (1.0); e-mail exchange w/Jon re Third Amended Complaint (0.2) ; further correspondence re police disciplinary records to be produced and confidentiality of same (0.5); pre-mediation telephone call with Judge Brazil (1.0); review documentation re client's Starr Way property (2.0)	4.7
2/25/20 - Further exchange w/Jim re psych evaluation audio (0.2); prepare Dr. Wasserman for deposition (1.3); r/t SF/Palo Alto (1.5); look at additional materials re Starr Way lot split (.4); prepare for Maldonado depo (1.0); Read Jon's proposal for production of electronically stored documents (0.4)	4.8
2/26/20 - Receive police disciplinary records from Jon and review (0.8); complete preparation for Maldonado Depo (1.0); receive and edit Jim and Lisa preambles for mediation (2.9); telecom re same (.3)	5.0
2/27/20 – Mediation (3.5) inc. travel; prepare documents for Wasserman deposition (1.0); telecom w/Jim (0.4)	4.9
2/28/20 - Complete Maldonado deposition (1.0); complete Wasserman prep. (1.5) defend Wasserman deposition (4.0); r/t travel SF/SJ (2.0)	8.5
3/1/20 - correspondence w/Jim and Lisa re confidentiality of couples counseling notes	0.2
3/20/20 - Email to Jon re possible adjustment of dates for expert witness events	0.2
3/21/20 - Telecon w/Jim re status and updates	0.6
3/23/20 - Text exchange w/Jim (0.1); research re federal standard for leave to amend (2.0)	2.1
3/24/20 - Check N.D. Cal. Court website for response to Covid Crisis (0.5) ; telecom w/Jon re extending deadlines	

for expert witnesses (0.5); prepare stipulation and proposed order re above and send to Jon (.6); text exchange w/Jim re same (0.3)	1.9
3/25/20 - Read Beninger and Maldonado depo. transcripts and take notes	2.9
3/26/20 - Text and telephone exchange w/Jim re getting Jon to stipulate to filing of TAC (0.3) and extension of briefing schedule for summary judgment (0.6)	0.9
3/30/20- Complete research re federal standard for leave to amend (2.0); send cases and email re same to Jon (0.9)	2.9
4/1/20 - E-mail exchange w/Jon re his refusal to stipulate to filing of TAC (0.5); e-mail Judge Freeman's courtroom deputy re motion dates and impact of Covid on trial date (0.3); final edits to TAC (1.7)	2.5
4/3/20 - Text Jim re time for 3-way telecom w/Dr. Wasserman, and deadlines/court dates	0.2
4/4/20 - Read Jim's text re Dr. Wasserman as expert	0.1
4/5/20 - Read Jim's correspondence w/Cecil Webb as expert	0.3
4/6/20 - Prepare Motion for Leave to File TAC and transmit to Jim (4.0); Read Jim's text about arranging call (0.1)	4.1
4/9/20-File Motion for leave to file TAC and send stamped copy to Jim	.6
4/18/20 - Review Jim's correspondence w/Cecil Webb	0.2
4/19/20 - Telecon w/Jon re agreement to extend deadlines and send letter to Judge requesting extension of summary judgment and trial dates (0.7); draft letter and send to Jon (1.2); review Jon's draft stipulation and comment (1.0); negotiate language of letter and stipulation (0.6)	3.5
4/20/20- Draft Response to Request for Production of Documents and transmit to Jim (2.0); text exchange and telecom w/Jim (0.8)	2.8
4/21/20 - Begin reading Wasserman depo transcript and take notes (2.5); telecom w/Lisa and Jim re status (0.6)	3.1

4/22/20 - Finish reading Wasserman depo transcript and taking notes	1.7
4/24/20 - Receive Judge Freeman's order resetting summary judgment motion and trial (0.4); go through box of documents to be produced (3.6); telecom w/Jim re document production and Dr. Wasserman's diagnosis (0.5); e-mail to Jon re Dr. Wasserman (0.5)	5.0
4/25/20 - Review Jon's response re Dr. Wasserman (0.2); Receive Defendant's Opp. Motion to file TAC, read and transmit to Jim (1.0); revise draft re Production of Documents and transmit to Jim (0.7)	1.9
4/26/20 - Begin work on Reply in Support of Motion to File TAC	3.1
4/27/20 - Complete draft of Reply Brief in Support of Motion to File TAC (3.5); prepare Stipulation and Proposed Order re Scheduling and Transmit to Jon (0.5)	4.0
4/28/20 - Further work on document production including privilege and "contemporaneous notes" issues (4.0); review Jim's edits to Reply in Support of Motion to File TAC (0.5); firm up details of scheduling stipulation and proposed order (0.5)	5.0
4/29/20 - Compile documents to be produced and mail to Jon together with Response to Request for Production (3.5); revise and file Reply in Support of Motion to File TAC (1.0)	4.5
4/30/20 - E-mail Jim final Reply in Support of Motion to File TAC (0.1); Reach out to Jeff Stanley re expert witness project (0.5)	0.6
5/6/20 e-mail Jon re status of defendants' supplemental document production	0.3
5/7/20 - Further communications w/Rizelle Pecson and Jeff Stanley re expert testimony	0.6
5/8/20 - Read Jon's email re supplemental document production and respond; agree to extend deadline for motion to compel further discovery	0.8

5/9/20 - Approve form of stipulation and proposed order extending time to move to compel (0.5); write to Rizelle and Jeff to set up Zoom meeting re expert testimony (0.3); discussion w/Jim re expert witnesses (0.5)	1.3
5/18/20 - confirm meeting w/Jeff Stanley and Rizelle (0.2); draft expert report for Jeff's signature and transmit (1.8)	2.0
5/19/20 - Zoom meeting with Jeff Stanley and Jim	0.7
5/22/20 - E-mail exchange and telecom w/Jim re damage calculation and damages expert	0.9
5/26/20 - Review and respond to Jon's letter re document production	0.6
5/27/20 – Review e-mail from Jeff Stanley and request meeting (0.2); telephonic meeting with Jon re Defendants' supplemental document production (0.5); stipulation to extend deadline for motion to compel (0.5)	1.2
5/28/20 - Confirm that Santa Clara Main Jail in SJ does not bail inmates after midnight (0.5); revise Stanley declaration (0.5) ; Zoom meeting with Jim and Jeff (0.5); attempt to open Defendants' supplemental document production and request alternative format (0.2).	1.7
5/29/20 – e-mail exchange w/Jon re outstanding issues concerning document production	0.6
6/1/20 – Transmit Stanley Dec. to Jon; exchange w/Jim re expert depo. dates	0.5
6/2/20 - resolve technical problems w/opening supplemental document production and transmit to Jim (0.4); review supplemental production (4.2); telephone conference w/Jon re outstanding disputes regarding supplemental production (0.6)	5.2
6/3/20 – telecon w/Jim re need for rebuttal experts	.5
6/4/20 – receive and review log of arrests for sex crimes (2015 to present) (1.2); telecon w/Jim re status (0.5); review defendant's further supplemental production (training notes) (0.9)	2.6

6/8/20 – email exchange w/ Jim re falsehoods in Davies’ opinion	0.6
6/9/20 - review playback versus Stutchman exhibits	0.5
6/12/20 – read court order converting Motion to File TAC to Zoom	0.1
6/14/20 – telecon w/Jim re experts etc. (0.5); read MVPD puff piece (0.2)	0.7
6/15/20 – Respond to court re questions concerning Zoom appearance (0.2); receive Motion for S.J. and transmit to Jim (0.4); initial review of Motion for S.J. (2.0)	2.6
6/16/20 – Research re consent entries	2.9
6/17/20 – Prepare for hearing on Motion to File TAC (0.8); respond to Jim re timing of hearing and how to join (0.2); further research re consent entries (4.8)	5.8
6/18/20 – technical set up for Zoom motion hearing (0.2); further exchange w/Jim and Lisa on how to join (0.2); hearing on motion for leave to file TAC (0.8); telecom w/Jim afterward (0.6); complete research re consent entries (2.1)	3.9
6/19/20 - Arrangements to extend time for service of Supplemental expert reports (0.5); begin research on Second Cause of Action Opp. S.J. (3.7)	4.2
6/20/20 – Exchange w/Jim re point in interrogation video where Ward says to Jim: “you just said no . . .”	0.5
6/21/20 – Search for cases with MVPD as Defendant and send to Jim (2.0); read further Article concerning MVPD (.4)	2.4
6/22/20 – E-mail exchange w/Jim re conveying interrogation video to judge (.3); exchange re depo dates for expert witnesses (.3); further research on Opp. S.J. Second Cause of Action (3.1)	3.7
6/23/20 – Further exchange w/ Jim re expert witnesses (.4); complete legal research on Second Cause of Action Opp. S.J.(2.3)	2.7
6/24/20 – e-mail exchange with audio expert Andy Singer (.5);	

Begin research on Third Cause of Action Opp. S.J. (2.9)	3.4
6/25/20 - Arrangements for further extension of time to serve rebuttal expert reports (.7); exchange w/potential audio expert witness Andy Singer (0.9); further exchange w/Jim re “just said no” video (.2); Complete research on Opp. S.J. Third Cause of Action( 2.0)	3.8
6/26/20 – Further exchange w/audio expert Andy Singer	0.2
6/27 – Further exchange re Andy Singer	0.1
6/29 – File TAC (0.4) – research re Marco Garcia’s possible liability as supervisor (negative result) (1.0); Begin research on municipal liability ( <i>Monell</i> ) for Opp. S.J. (1.1); Further exchange w/Andy Singer (.2)	2.7
6/30/20 – Complete research re municipal liability (3.0); Read letter from Dr. Wasserman (.4); further e-mail exchange w/Andy Singer (0.3)	3.7
7/1/20 – Conversation w/Andy Singer (0.8) and text exchange w/Jim re expert deposition dates available in August (0.2)	1.0
7/2/20 – Further communications w/Andy Singer (.6); review Singer draft engagement letter and inform Jim that it is eminently reasonable (0.6)	1.2
7/5/20 – Finalize Singer report	0.8
7/6/20 – Submit Singer report to Jon (0.2); review BCV multiple times and begin writing Argument I (consent entry issue) for Brief Opp. S.J. (3.2)	3.4
7/7/20 – Further drafting on Argument I of brief Opp. S.J.	5.3
7/8/20 – Further work on Argument I section of brief Opp. S.J.	5.2
7/9/20 – Receive and review Document Retention Schedule from Jon (.3) ; read e-mail from Jon re use of documents designated as confidential (.3); continue with work on Argument I of brief Opp. S.J. (4.9)	5.5



7/10/20 – Edit and proofread Argument I of brief Opp. S.J (3.8); send to client with questions (.5).	4.3
7/11/20 – Begin research on Argument Section 2 of brief (4.1); email exchange w/Jim re section of brief concerning consent entry (0.6)	4.7
7/12/20 – More research on Argument Section 2 of Brief (2.0); Draft and send Elizabeth Jordan Devaney Declaration (1.0) - Email exchange w/Jim re draft section of Opp. S.J. brief addressing consent entry (.6); telecom w/Jim and Lisa re same (.7); begin writing Argument Section 2 Opp. S.J. (1.0)	5.3
7/13/20 – Email exchange w/Lisa re brief Opp. S.J. argument section 1 (0.4); telecoms w/ Jim and Lisa re same (1.0); incorporate Jim and Lisa edits to argument section ( 3.1)	4.5
7/14/20 – Further exchange w/Jim and Lisa re consent entry into home (0.7); complete drafting argument section 2 (5.5)	6.2
7/15/20 – further drafting Argument section 3	4.7
7/16/20 – Complete draft of argument section 3 Opp. S.J. (2.0); draft section 4 (Marco Garcia) (1.0) ; begin work on section 5 (municipal liability) (3.1)	6.1
7/17/20 –complete drafting Section 5 of brief (municipal liability) (4.0); begin drafting Introduction/Statement of Facts (1.4)	5.4
7/18/20 – edit brief and insert references (7.7); contact Jon re use of confidential portion Maldonado depo in brief (0.5)	8.2
7/19/20 - Edit second draft of brief and proof read (5.5); Send to client (0.1); draft Jim and Lisa Declarations and send (4.5); draft my own declaration (1.5), begin work on exhibit compilation (0.5)	12.1
7/20/20 – confirmation w/Jon re stipulation that no officer was disciplined in connection with Lothar incident (for use in lieu of confidential section of Maldonado depo.) (1.0); discussion w/Jim and Lisa re further edits to brief and declarations (1.0) ; input edits (2.0); locate, compile and highlight exhibits to Grayson Declaration ) (6.9)	10.9

7/21/20 – Finalize brief and all supporting documents (5.8), send to CA for creation of cover, tables etc. (.9); file with court (0.5); arrangements for Jim to drop off jump drive (0.3)	7.5
7/29/20 – Further correspondence re expert deposition dates	0.5
7/31/20 – Read Defendants’ Reply in Support of Summary Judgment and send to Jim (1.0); Correspondence re Judge’s Order requiring transcription of body camera video (0.5)	1.5
8/1/20 – Further correspondence re order requiring transcription of body camera video and Jon’s version of same (0.2) ; correspondence w/Jon re expert depo dates (0.2)	0.4
8/2/20 – Read Jim’s letter re <i>Elsayed</i> case	0.1
8/3/20 – Locate and read <i>Elsayed</i> case and send to Jim (1.0); Further work on transcription of body camera video (2.0); further exchange w/Jon re Fonzi and Stutchman depositions (0.5)	3.5
8/4/20 – Complete and file objection to Defendants’ transcription of body camera video (1.5); receive Court’s order to create agreed upon version of transcript (.3); correspondence with Jon concerning agreed upon transcript (.6)	2.4
8/5/20 – Work on agreed upon version of transcript of body camera video	1.3
8/6/20 – Exchange of drafts of transcript of body camera video (2.2); telecom with/Jon re agreed upon version (.5); negotiate language of document transmitting agreed version to Court (0.5)	3.2
8/10/20 – Draft and send Laura Davies subpoena duces tecum	0.7
8/12/20 – Receive <i>Kamerei</i> case materials from Jon and forward to Court in advance of SJ hearing (1.4); begin preparation for SJ hearing (3.3); correspondence re Stanley deposition (0.2); telecom w/Jim (0.5)	5.4
8/13/20 – Complete preparation for SJ hearing (2.7);	

Participate in SJ hearing via Zoom (1.0); telecom w/Jim (0.5)	4.2
8/15/20 – Forward audio recording of Davies interview with Jim to Jon (0.2); select and collect documents for Davies Deposition (1.6)	1.8
8/16/20 – Further preparation for Davies depo.	3.1
8/17/20 – Further preparation for Davies depo. (2.8); Text exchange w/Jim (0.1)	2.9
8/18/20 - Receive from Jon and review some documents responsive to Subpoena Duces Tecum for Davies depo. (1.0); track down plaintiff's counsel from <i>Baldosano</i> case and obtain additional documents from him (1.5); complete deposition outline for Davies including newly obtained exhibits (1.7)	4.2
8/19/20 – Davies deposition day 1 (3.1); discuss Judge Freeman's Standing Order re Civil Jury Trials w/Jim over lunch (0.8)	3.9
8/20/20 – Correspondence w/Jon and Wayne Brazil re completion of Davies Deposition (0.5); review video and transcript of Davies Deposition Part 1 (3.5)	4.0
8/21/20 – Arrangement for Zoom conference w/Jon and Judge Brazil (0.5); text exchange w/Jim re Davies deposition (0.2)	0.7
8/23/20 – Forward Davies Depo. TR Part 1 to Judge Brazil	0.2
8/24/20 – Telecon w/Jon and Judge Brazil (1/0); engagement letter for Judge Brazil (4); email exchange w/Jon re hours remaining in Davies depo. (0.2)	1.6
8/25/20 – Further preparation for continued deposition of Dr. Davies (2.7); correspondence and telecon w/Jim and Lisa re Lisa's letter to Chris Hsiung (1.0); text exchange w/Jim re above and settlement( (0.2)	3.9
8/26/20 – Complete preparation for Davies depo. (3.7) Part 2; telecom w/Lisa re her letter to Chris (0.5); telecons w/Jim and Jon re same (0.5); further exchange w/Jon re time remaining in Davies deposition (0.2).	4.9

8/27/20 – Complete Davies deposition	8.0
8/28/20 – Exchanges w/Jon re agreed filing concerning lack of desire for court-sponsored settlement services (0.5); receive Judge Freeman’s Order re SJ and read and transmit to Jim (1.5); text exchange w/Jim re sending Davies report to Wasserman (0.2)	2.2
8/30/20 – Receive Jim’s email re letter to Mountain View City Council Members	0.5
8/31/20 - E-mail exchange w/Jon re arrangements for Stutchman and Fonzi depositions	0.2
9/1/20 – Review Stutchman and Singer reports in preparation for Singer Deposition (1.0); telecom w/ Andy Singer (0.7)	1.7
9/2/20 – Defend Singer deposition on Zoom (1.2); follow up e-mail exchange w/Andy Singer (0.5) ; text exchanges w/Jim re Singer depo. and blocking out time to discuss major issues (0.3); review Jim’s redrafted letter to City Council members and telecom re same (0.6)	2.6
9/3/20 – Brief text exchange w/Jim re schedule and priorities	0.2
9/4/20 –telecom w/Jim re major strategy decisions (1.0); read Chris Hsiung’s email to Lisa (0.2)	1.2
9/6/20 – Read Jim’s letter just sent to multiple City Council members	0.2
9/7/20 – Correspondence w/Jon re propriety of Jim’s letter to City Council Members (0.3) and delay of Fonzi deposition (0.3)	0.6
9/8/20 – Research whether expert testimony re probable cause is admissible	3.0
9/9/20 – e-mail to Jon re meet and confer date and proposed stipulations (0.4); email exchange w/Jim re Wasserman bills (0.5); begin drafting Motion <i>In Limine</i> # 1 (2.0);	

research re whether expert testimony re consent is admissible (2.5)	5.4
9/10/20 – e-mail exchange w/Jon re Stutchman depo. exhibit (0.3); prepare for Stutchman deposition (2.8)	3.1
9/11/20 – complete preparation for Stutchman depo. (1.0); telecons w/Jon and Jim re delay of Stutchman depo. (0.6); Complete <i>Motion in Limine #1</i> and send to Jim (2.1); research whether qualified immunity is question of law for court or question of fact for jury (1.0); begin work on Fonzi Deposition Outline (1.0)	5.7
9/12/20 – email exchange w/Jim re confirming Fonzi and Stutchman deposition dates	0.3
9/14/20 – reschedule Fonzi and Stutchman Depos.	0.5
9/15/20 – Correspondence re communications w/Dr. Wasserman (0.3); Research for In Limine Motion #3 (Fonzi) (2.0); Supplemental research for Motion in Limine #1(1.0)	3.3
9/16/20 – Further correspondence re communications w/Dr. Wasserman (0.3); more legal research for motions in limine (2.7); draft and send Fonzi subpoena duces tecum (0.7)	3.7
9/17/20 – Addition to Fonzi subpoena duces tecum (0.4); begin reading Davies Deposition (4.2)	4.6
9/18/20 – Stutchman Deposition (1.3); draft Motion in Limine to exclude Stutchman testimony (2.6); receive and review first tranche of documents responsive to Fonzi subpoena duces tecum (1.0)	4.9
9/20/20 – Receive and review further documents responsive to Fonzi subpoena duces tecum (1.0); correspondence w/Jon re same (0.3); prepare for Fonzi Deposition (2.5)	3.8
9/21/20 – Fonzi Deposition (3.0); begin drafting motion in limine to exclude Fonzi testimony (2.6)	5.6
9/22/20 – Prepare draft of body of Joint Pretrial Statement (“JPS”) and send to Jon (2.5); complete draft of motion in limine to exclude Fonzi testimony (2.6)	5.1

9/23/20 – Prepare Draft of Appendix to Joint Pretrial Statement (witnesses and exhibits) and send to Jim	1.7
9/24/20 – draft motion in limine # 2 (Davies)	4.0
9/25/20 – Follow up on late Fonzi Depo. TR (0.3); text exchange w/Jim (0.2)	0.5
9/26/20 – More work on witness and exhibit list for Appendix to JPS (0.6); follow up w/Jon on copy of Britton Moore judgment of conviction and Davies’ Anxiety Scale missing from her notes packet (0.5)	1.1
9/27/20 – More work on witness and exhibit lists	0.5
9/28/20 - Finalize Plaintiff’s proposed witness and exhibit lists and send to Jon (0.5); correspondence w/Jon re admissibility of Britton Moore conviction (0.5); conversation w/Jon re Dr. W. (0.5); finalize stipulation that Dr W. is unavailable for trial (0.5); text exchange w/Jim (0.2)	2.2
9/29/20 – More work on witness and exhibit lists (1.6); text exchange w/Jim re new psychiatrist (0.2)	1.8
9/30/20 – Draft and finalize Motion In Limine #5 (Lisa’s email to Chris Hsiung) (1.7); receive and review Jon’s edit of JPS and defense exhibit list (1.0); telecon w/Jon (0.4); stipulation to continue filing of PTS until Monday (0.4)	3.5
10/1/20 – Telecon w/Jim re his proposed edits to motions in limine (0.5); finalize and file all 5 motions in limine (2.7); transmit Fonzi bill to Jim (0.1); read Jon’s email w/case authority concerning Britton Moore’s conviction (0.5); telecon w/Jon re same (0.4)	4.2
10/3/20 – Email exchange w/Jon re admissibility of evidence regarding Jim’s finances and employment (0.8); review in detail Jon’s proposed defense exhibits (1.0); further work on appendix to JPS (2.2)	4.0
10/4/20 – Review Defendants’ just-filed Answer (1.0); research procedural history and discover that	

Defendants had not previously filed answer (1.0); research timeliness of filing (0.5); insert Plaintiff's objection to late filing of affirmative defenses into JPS (0.5); add damages documents to Plaintiffs' exhibit list (0.6); insert Plaintiff's opposition to specified Defendants' exhibits into JPS Appendix (1.8); transmit Defendants' motions in limine to Jim (0.2)	5.6
10/5/20 – Exchange w/Jim re Jim's narrative and other exhibits (1.0); exchange w/Jon re time for giving jury instructions (0.2); finalize and file JPS w/cover, and Appendix of witnesses and exhibits (5.0)	6.2
10/6/20 – Prepare 1 <sup>st</sup> draft of jury instructions re consent to enter and send to Jon (3.9); begin work on juror voir dire questions (1.0); email exchange w/Jon re juror questionnaire (0.3)	5.2
10/7/20 – Draft complete opposition to motion to exclude Maurice (1.5); work on opposition to other defense in limine motions (1.3); draft voir dire/ juror questionnaire questions relating to child molestation (1.0)	3.8
10/8/20 – Draft jury verdict form (0.5); complete opposition to all Defendants' in limine motions (2.0); receive Jon's markup of my jury instructions and negotiate jury instructions w/Jon (3.5); write arguments in opposition to Defendant's Disputed Jury Instructions and in support of Plaintiff's Disputed Jury Instructions (3.5); proof read jury instructions (.7); finalize proposed voir dire and proposed juror questionnaire (0.5)	10.7
10/9/20 – Send to Jim: Defendants' responses to Plaintiff's motions in limine, filed proposed jury instructions (w/cover sheet), proposed voir dire, and proposed juror questionnaire	0.5
10/10/20 – email to Jim re trial logistics	0.2
10/11/20 – Telecom w/Jim re logistics including paralegal and hotel for trial	0.6
10/14/20 – Send link for Pretrial Conference to Jim (0.1); begin preparation for pretrial conference (1.8)	1.9

10/15/20 – texts and telecon w/Jim re upcoming pretrial conference (0.5); complete preparation for pretrial conference (1.0); participate in pretrial conference (2.0); order transcript of pretrial conference (0.5)	4.0
10/16/20 – Receive and read transcript of Pretrial Conference (1.4); find and transmit email stating that Jim received a refund from JAMS (0.3).	1.7
10/17/20 – draft proposed juror questionnaire question concerning child touching (0.7); e-mail Jon re need to include such a question in juror questionnaire (0.5)	1.2
10/19/20 – Telecon w/Jim re strategy and voir dire question re touching a child (0.4); e-mail final form of proposed verdict to Jim (0.2), remind Jim to propose any additional exhibits (0.5), discussion re Dr. Greene (0.4)	1.5
10/20/20 – Further exchange w/Jim re above (0.5); multiple emails with Jon re adding question concerning touching a child to juror questionnaire, designation of exhibits, additions to witness lists, whether Stutchman and Singer will testify (1.3); read email exchange between Lisa and Chris Hsiung regarding Jeffrey and Starr Way (0.2)	2.0
10/22/20 – Read Judge Freeman’s order on motions <i>in limine</i>	0.6
10/26/20 – Multiple email exchanges w/Tiffany Salinas-Harwell re reopening of courthouse and time of trial (0.6); e-mail exchanges w/Lisa regarding her testimony (0.9)	1.5
10/27/20 – E-mail exchange w/Jon re timing for exchange of medical exhibits	0.2
10/28/20 – Read further exchanges between Lisa and Chris Hsiung regarding Jeffrey and Starr Way	0.1
10/29/20 - Read final exchange between Lisa and Chris Hsiung regarding Jeffrey and Starr Way (0.2); Prepare Cross-Examination outline for R. Fonzi (3.3)	3.5
10/31/20 – Confer w/R. Park and agree to structure of	



trial notebooks to be created in Seattle and transported by Park to San Jose (1.5); Begin prep. Cross-Examination Outline for Patrick Ward (4.2)	5.7
11/1/20 – text exchange w/Jim re pharmaceutical bills and the need for Dr. Yanklowitz to appear in person (0.5); Prepare cross-examination outline for Britton Moore (4.3)	4.8
11/2/20 – Create outline for trial notebooks and send to R. Park (1.2) ; email Park documents for inclusion in trial notebooks (2.3); negotiations w/Jon re admissibility of Wasserman notes, designation of further exhibits, Lisa, Davies, Beninger and Garcia appearing at trial without subpoenas; limitations on Dr. Yanklowitz’s testimony; courtroom audio-visual equipment (1.5); Review Lisa Zuegel depo. TR and SJ Dec. then begin draft of Lisa trial testimony outline (3.2)	8.2
11/3/20 – Complete Lisa testimony outline and email to Lisa (2.3); e-mail exchange w/Jon re 4 <sup>th</sup> Amended Complaint (.4); detailed review of Wasserman notes (1.2); further negotiation w/Jon re admissibility of Wasserman notes in whole or in part (0.6); further correspondence w/Tiffany re reopening of Courthouse (0.4); prepare examination outlines for P. Beninger and C. Hsiung (2.5)	7.4
11/4/20 – exchange w/Jon re letting Judge decide which portions of Wasserman’s notes will be admitted (.3); prepare Garcia examination outline (3.0); begin work on Davies examination outline (3.5)	6.8
11/5/20 – Review Jim depo. TR and begin work on Jim trial testimony outline	4.2
11/6/20 – text exchange w/Jim re who will play Dr. W. (0.2); correspondence w/Court and client re reopening for civil jury trials (0.6); read judge’s supplemental scheduling order (0.4); communications w/Jon re revised verdict form (0.4); further work with R. Park on trial notebooks (1.0); further work on Davies trial outline (1.8)	4.0
11/7/20 – Begin work on Trial Brief	3.9
11/8/20 – more work on trial brief (4.2); work on exhs. (1.5); arrangements w/counsel for Patti Yanklowitz testimony (0.9); prepare Yanklowitz subpoena duces tecum (0.5); further	

communications w/Jon re Wasserman initial interview notes and Jim's Conviction of Innocence article (0.6); telecom w/Jim and Lisa re strategy (0.8) 8.5

11/9/20 – Zoom conference w/Judge re jury selection etc. (0.9); text exchanges w/Jim (0.2); finalize and file trial brief (2.2); work with Jon on verdict forms (0.4); organize and pack trial materials (2.8); final coordination w/Robert re trial and witness notebooks (2.0); correspondence w/Tiffany re Courtroom walk through (0.5) 9.0

11/10/20 – Complete Jim's 1<sup>st</sup> draft testimony outline on airplane (4.1); get set of up in hotel room (1.5); meet with Jim (2.5); correspondence w/Jon re Britton Moore conviction (0.3); check trial notebooks prepared by Robert Park (1.0); read Defendants' Trial Brief and look up cases (1.2) 10.6

11/11/20 – Work on exhibits and loading onto thumb drive (1.0); work with Jim on his testimony (3.2); more correspondence w/Jon re Britton Moore misdemeanor (0.3); review Defendants' exhibit notebook (1.0); begin work on Opening Statement (3.1) 8.6

11/12/20 – Complete labeling of exhibits and loading onto thumb drive w/Robert and Jim (0.7); courtroom walk-thru & jury instruction conference (inc. travel) (4.7); prep Jim's brief initial testimony (1.5); read through all juror questionnaires and make initial selection (3.0); complete opening statement draft and practice (3.0) 12.9

11/13/20 – Finalize Opening Statement with Jim (1.0); Select jury (3.0); Opening Statements (1.8); prep and deliver Jim's initial testimony – show video 2x + admin details w/Court (inc. travel) (2.6) 8.4

11/14/20 – Read Friday's transcript (0.6); further correspondence w/Judge and Jon re jury instructions (2.0); Complete outline for Davies testimony (3.1); prep Jim's trial testimony (1.7); initial prep. of Lisa Trial Testimony (1.2) 8.6

11/15/20 - Additions to notebooks (0.9); sort out stipulated Wasserman testimony with Jon and prep. w/Robert Park for same (3.0); arrangements for appearance of Chris Hsiung (0.5); further prep. of Jim testimony (3.5); more prep. of Lisa testimony (1.0) 8.9

11/16/20 – Complete prep of Lisa's testimony (2.0); trial (witnesses Jim, Lisa, Wasserman, and Hsiung) inc. travel (8.5); further arrangements for Pattie Yanklowitz testimony (0.5); read Jon's supplemental trial brief and begin preparation of written

response (1.4)	12.4
11/17/20 – Complete written opposition to Jon’s supplemental trial brief, e-mail to Judge Freeman and file with Court (2.6); argument re above (0.5); read prior day’s trial transcript (1.0); testimony of Yanklowitz & Davies & beginning of begin Ward testimony (inc. travel) 8.0; arrangement for Beninger appearance (0.4)	12.5
11/18/20 – Read prior day’s transcript (1.0); research and preparation for opposition to Jon’s Rule 50 Motion (2.0); orally oppose same (0.5) ; revise cross-examination prep. for Ward in light of testimony (0.9); testimony of Ward, Moore, Beninger and Fonzi (5.9); commence work on summation (1.5)	11.8
11/19/20 – Read Jim’s “key takeaways” email (0.6); complete preparation of summation & practice (4.0); deliver summations to jury (2.0); listen to jury instructions (0.5); receive officer financial info from Jon (0.3); deliver juror questionnaires for shredding (0.1)	7.5
11/20/20 – Wait during deliberations while working on answers to jury questions and preparing for possible punitive damages phase (7.5) ; receive jury verdict and corrections to jury verdict (1.0) rt/travel to courthouse (0.9)	9.4
11/21/20 – Pack and dispose of trial materials	1.0
11/24/20 Begin research re fee application	2.1
11/27/20 Look up juror e-mails and send emails requesting phone call (1.2); correspondence w/juror Darrell Robertson and transmit to Jim (1.5); e-mail exchange w/Jim (.5); negotiate extension of time to file fee application with Jon (0.8); prepare and file stipulation re same (0.6)	4.6
11/28/20 – Further research for memorandum in support of fee application (3.0); create categories for chart categorizing fees (0.6); collect contemporaneous time sheet data for myself, Zarrillo and Park for paralegal entry into timekeeper chart (1.0)	4.6
11/29/20 - Collect and list expenses for case for use in fee application	4.2
11/30/20 – Work with paralegal to set up chart for entry of time records (1.0); color code time entries by category for fee application chart (2.9); work on identifying lawyer to create declaration re hourly billing rates prevalent in N.D.CA (2.0)	5.9

12/1/20 – Request copies of juror correspondence w/Deputy Chief Hsiung (0.5); correspondence and telecoms w/Jon re same (0.8); more work on expense list (0.9)	2.2
12/2/20 – Further color coding of time entries for fee application chart	3.4
12/3/20- Follow up on attorney declaration re hourly billing rates (0.5); follow up re defense counsel’s refusal to turn over juror correspondence w/Deputy Hsiung followed by research re same (1.0) conversation with juror Robertson and obtain correspondence from him (0.8)	2.3
12/4/20 – Follow up on outside counsel declaration re attorney billing rates in the Northern District of California (0.5); Research re bills of cost in Northern District (.8); complete research concerning fee applications (4.0)	5.3
12/5/20 – Telcom w/Robert S. Smith concerning declaration re Grayson qualifications in support of fee application (0.7); more work with paralegal on conversion of contemporaneous time records to chart and chart for expenses (1.0); begin drafting “Controlling Law” section of brief in support of fee application (4.2); email exchange w/adverse counsel re due date for bill of costs	5.9
12/6/20 – Email exchange w/adverse counsel re time for meet and confer re attorneys fee and expense application (0.3); complete “Controlling Law” section of brief in support of fee application (2.7); begin review of trial transcript for use in Synopsis of Case section of brief in support of fee application (3.7) telecom w/client re status of fee and expense application (0.5)	7.2
12/7/20 – Work with paralegal on documentation to accompany bill of costs (0.7); first draft of Introduction to Brief in Support of Fee application (1.0); complete review of trial transcript (1.0); begin work on Synopsis of Case section of brief in support of fee application (3.5)	6.2
12/8/20 – E-mail exchange w/Tiffany Salinas-Harwell re hearing date for fee application (0.3); send adverse counsel draft fee and expense charts in anticipation of meet and confer (0.1); meet and confer w/adverse counsel re fee application and expenses (0.4); telecom w/Robert Seeds concerning declaration in support of fee application (0.7); more work on Synopsis of Case section of brief in support of fee application (4.6)	6.1
12/9/20 – Produce First Draft of “Application of Law to Facts” section of Brief in Support of Fee Application	7.2
12/10/20 – Produce First Draft of Grayson Declaration in Support of Fee and Expense Application	6.5

12/11/20 – Begin editing own declaration and Brief in Support of Fee and Expense Application including coordination between two documents	5.9
12/12/20 – Further editing and coordination of own declaration and Brief in Support of Fee Application (5.0) ; begin compilation of exhibits to own declaration (0.4)	5.4
12/13/20 – Work with paralegal Verillo to complete collection and labeling of exhibits to Grayson Declaration (1.8); Complete edit of declaration and brief and send to client (3.2); create Notice of Motion (0.6)	5.6
12/14/20 – Finalize brief and Grayson Dec. in Support of Fee application and and send to Typelaw for Cover and Tables (2.7); complete Bill of Costs (2.0) ecf filing with Court (1.0)	5.7
12/21/20 – text Jim re upcoming Rule 50(b) motion (0.1); e-mail file-stamped fee motion to Jim (0.3); telecom w/Jim re upcoming litigation events (0.5)	0.9
12/22/20 – Further text exchange w/Jim re upcoming events in case (0.2) initial review of Rule 50 (b) motion (0.5); transmit motion to Jim (0.1)	0.8
12/27/20 – E-mail exchange and telecom w/Jon H. re meet and confer on Bill of Costs (0.4); reread defendants’ Rule 50 (b) motion (0.5); begin research on Rule 50 (b) motion (3.4)	4.3
12/28/20 – Further research for Opp. Rule 50 (b) motion	3.9
12/29/20 – Work on brief Opp. Rule 50 (b) motion (drafting procedural history) (5.1); create Grayson Dec. Opp. 50(b) motion and organize exhibits to declaration (2.8)	7.9
12/30/20 – Further work on procedural history section of brief Opp. Rule 50(b) motion (2.0); begin drafting of legal argument for brief Opp. Rule 50 (b) motion (3.6)	5.6
12/31/20 – Further drafting of legal arguments for brief Opp. Rule 50 (b) motion	6.1
1/1/21 - Complete and edit draft of brief Opp. Rule 50 (b) motion (6.3); send draft to Jim with note (.2)	6.5
1/2/21 – Final proof and polish for brief Opp. Rule 50 (b) motion (2.8); send brief to Typelaw for cover and tables (0.5); initial review of Defendants’ Opposition to Bill of Costs (0.5); e-mail Bill of Costs to Jim with note (0.2); ecf file Grayson Dec. Opp. Rule 50 (b) motion with exhibits (0.6)	4.6

1/5/21- Download and review Defendants' Opp. Fee and Expense Motion (3.9); send to client w/note (0.2); email exchanges w/adverse counsel re extension of time to respond (0.4); draft and file stip for extension order on time to respond (0.5)	5.0
1/6/21 – Draft Motion to Strike Schratz Declaration (3.8); file with Court (0.3); send to client with explanation (0.3); correspondence with adverse counsel and Court re Motion to Strike (0.5); correspondence w/Court re conforming time chart (0.5)	5.4
1/7/21- Research re “relatedness” and apportionment of hours under § 1988	4.3
1/8/21 – Research published cases where James Schratz was fee expert (2.6); begin drafting section of Reply Brief concerning “relatedness” and apportionment of hours (3.3)	5.9
1/9/21 – Review Defendants' Response to Motion to Strike (0.3); complete first draft of “relatedness” section of Reply Brief re fees motion (3.0)	3.3
1/10/21 – Further research re low damage awards and §1988 fee applications (2.9); first draft of section of Reply brief re same (3.5); update letter to client (0.5)	6.9
1/11/21- Read Court's order denying w/o prejudice Motion to Strike Schratz Dec. (0.2); Begin draft of Reply Brief section concerning counsel's hourly billing rate (4.0)	4.2
1/12/21 – More work on draft of section of Reply Brief concerning counsel's hourly rate (2.8); draft section of Reply Brief concerning expenses (0.7)	3.5
1/13/21 – Receive and review clerk's taxation of costs (1.0); check due date for Motion to Review Taxation of Costs (0.3); exchange w/adverse counsel re extension of time to file Motion to Review Taxation of Costs (0.3)	1.6
1/14/21 – Draft stip. and proposed order setting briefing schedule for Motion to Review Taxation of Costs – then send to adverse counsel for approval and file (0.6); begin drafting VEG Reply Dec. re Motion for Fees and Expenses (5.0) Purchase and read 2020 RRR (1.8)	7.4
1/15/21 – Further drafting of VEG Reply Dec. in Support of Fee and Expense Motion	4.9
1/18/21 – Complete 1 <sup>st</sup> draft of Reply Brief in Support of Fee and Expense Motion (2.0); Complete 1 <sup>st</sup> edit of Reply Brief (3.9)	5.9

1/19/21 – 1 <sup>st</sup> edit of VEG Reply Dec. re Fee and Expense Motion	4.8
1/20/21 – Draft JZ Dec. in Support of Fee and Expense Motion and transmit with note (0.7); exchange w/Robert Park re receipts (0.2)	0.9
1/21/21 – Second edit of Reply Brief and Reply VEG Dec. re Fee and Expense Motion (4.6); further exchange w/client re receipts (0.5)	5.1
1/22/21 – Further exchange w/client re declaration and receipts (0.5); proof read Reply Brief and VEG Reply Dec. adding cross-references (3.5)	4.0
1/23/21 – Send draft of Reply Brief and Reply VEG Dec. to client for comment/edit (0.1); work with paralegal Verillo on update of timesheets, expenses, charts, documentation of expenses, and compilation of exhibits to VEG Reply Dec. (6.9)	7.0
1/24/21 – Complete compilations of exhibits including expense documentation (5.6); review client suggestions/edits to Reply Brief and Reply VEG Dec. then input (2.0); finalize Park Dec. (0.5)	8.1
1/27/21 – E-mail exchange w/JAH re briefing schedule for Motion for Review of Taxation of Costs (“MRTOC”) (0.2); e-mail exchange w/Lee-Anne Shortridge re payment for trial transcript (0.2)	0.4
1/28/21 – Prepare and file proposed order re schedule for MRTOC (0.4); e-mail exchange w/JAH re possible mediation (0.2); email exchange w/client re same (0.1)	0.7
1/29/21 – Receive and review signed order on briefing schedule	0.1
1/30/21 – E-mail exchange w/client re filed documents and status of case	0.2
2/1/21 – E-mail to JAH re choice of mediator	0.1
2/6/21 – E-mail to client re documentation supporting bill of costs	0.1
2/7/21 – Begin work on Grayson Declaration in Support of MRTOC	3.8
2/8/21 – Further email exchange w/JAH re mediation (0.2); Further work on Grayson Dec. in Support of MRTOC (3.2); Begin work on P&A in Support of MRTOC (3.0)	6.4

2/9/21 – E-mail exchange w/Tiffany S-H re date for hearing of MRTOC (0.6); Prepare Notice of Motion for MRTOC (0.5); Further work on P&A in Support of MRTOC (3.5); text exchange w/client re exhibits and mediation (0.2)	4.8
2/10/21 – e-mail client re mediation date (0.1); edit drafts of Dec. and P&A in Support of MRTOC (2.9)	3.0
2/11/21 – Send MRTOC drafts to client for review (0.1) Finalize MRTOC including exhs. (1.9); Further exchange w/Tiffany S-H re motion dates (0.2)	2.2
2/12/21 – Final proof and file MRTOC (0.7); email exchange w/client re date for mediation (0.2)	0.9
2/16/21 – Further exchange w/JAH re scheduling mediation	0.1
2/27/21 – Review Defendants’ Opposition to MRTOC	0.7
3/1/21 – Prepare Grayson Reply Dec. in support of MRTOC and exhibits	3.1
3/2/21 – Research and draft Reply P&A in support of MRTOC	5.5
3/3/21 – Transmit Reply re MRTOC to client (0.1) and text exchange w/client re contents (0.2); finalize documents and exhibits (1.0)	1.3
3/4/21 – File Reply in support of MRTOC	0.4
3/6/21 – Text exchange w/client re mediation	0.2
3/9/21 – Complete JAMS documents for Mediation	0.2
3/13/21 – Correspondence w/JAMS re status and duration of mediation	0.2
3/15/21 – Further exchange w/JAMS re status and duration of mediation	0.3
3/17/21 – Further exchange re confirmation and length of mediation	0.2
4/13/21 – Draft and file letter to Judge Freeman re hearing schedule for post-trial motions (0.7); email copies to BLF and JAH (0.1); read Jon’s response (0.1)	0.9
4/14/21 – Exchange w/JAH re mediation and Starr Way lot split	0.3
4/16/21 – Respond to emails from BLF and JAH re setting post-trial motions for 5/13 (0.2); review JAH response re lot split (0.1); exchange re above w/client (0.1)	0.4



4/17/21 – Email JAH re exhibits for mediation briefs	0.1
4/18/21 – Further email exchange w/JAH re exhibits for mediation briefs	0.3
4/20/21 – Draft mediation brief (1.6) and send to client (0.1)	1.7
4/21/21 – Exchange w/client re content of mediation brief (0.2); Finalize mediation brief and exhibits and transmit to JAMS (2.0)	2.2
4/23/21 – Review Defense Mediation Brief (0.5); transmit to client and discuss (0.1); exchange w/JAMS re Zoom set up and participation (0.2)	0.8
4/25/21 – Text exchange w/client re JAMS confidentiality agreement and who will attend mediation	0.3
4/28/21 – Further text exchange w/client re who will attend mediation and mediation strategy	0.2
4/29/21 -Pre-mediation telecon w/client (0.5); mediation (4.2)	4.7
5/8/21 – Work on update of hours and expense records	2.0
5/9/21 – Work with Bea Verrillo on update to time and expense calculations and charts (1.7); draft letter to court re same (0.5)	1.9
5/10/21- Transmit letter and updated records to Court (estimated) (0.5)	0.5
5/12/21 – Prepare for hearing of post-trial motions (estimated)	4.5
5/12/21 – Hearing of post-trial motions (estimated)	1.5
<b>TOTAL HOURS DOCUMENTED</b>	<b>1410.7</b>